

EXHIBIT A

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KERNEN CONSTRUCTION CO.,
BEDROCK INVESTMENTS LLC,
SCOTT FARLEY and KURT KERNEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

v.

Case No. 4:24-cv-04067-YGR

DEFENDANTS' RESPONSES TO
PLAINTIFF CALIFORNIANS FOR
ALTERNATIVES TO TOXICS' FIRST
SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS

KERNEN CONSTRUCTION CO.,
BEDROCK INVESTMENTS LLC, SCOTT
FARLEY, and KURT KERNEN,

Defendants.

PROPOUNDING PARTY: PLAINTIFF CALIFORNIANS FOR ALTERNATIVES TO
TOXICS

RESPONDING PARTIES: KERNEN CONSTRUCTION CO., BEDROCK INVESTMENTS
LLC, SCOTT FARLEY, and KURT KERNEN

SET NUMBER: ONE

Pursuant to Rules 26(g) and 34(b)(2) of the Federal Rules of Civil Procedure, Defendants
KERNEN CONSTRUCTION CO., BEDROCK INVESTMENTS LLC, SCOTT FARLEY, and
KURT KERNEN ("Defendants") hereby respond to the First Set of Requests for Production of
Documents propounded by Plaintiff CALIFORNIANS FOR ALTERNATIVES TO TOXICS
("Plaintiff") as follows:

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1 to Requests 1-18, see Kernan-000449 to Kernan-000613.

2 **REQUEST FOR PRODUCTION NO. 14:**

3 Any and all DOCUMENTS setting forth each DEFENDANT's assets, liabilities and net
4 worth at all times between May 2, 2023 to the present, including but not limited to all real
5 property held by all DEFENDANTS.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

7 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
8 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

9 **REQUEST FOR PRODUCTION NO. 15:**

10 Any and all DOCUMENTS that refer, relate or pertain to each DEFENDANT's income from
11 May 2, 2023 to the present, including but not limited to all statements of annual gross income
12 and annual net income, whether audited or unaudited.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

14 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
15 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

16 **REQUEST FOR PRODUCTION NO. 16:**

17 All DOCUMENTS comprising each DEFENDANTS's federal income tax returns for all
18 years from 2023 to the present.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

20 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
21 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

22 **REQUEST FOR PRODUCTION NO. 17:**

23 All DOCUMENTS that comprise each DEFENDANT's IRS form 1099s submitted to the
24 IRS for all years from 2023 to the present.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

26 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
27 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

28 **REQUEST FOR PRODUCTION NO. 18:**

1 All DOCUMENTS that comprise each DEFENDANT's personal or business bank account
2 statements, including all brokerage accounts containing stocks, bonds or retirement fund
3 accounts for all years from 2023 to the present.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

5 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
6 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

7 **REQUEST FOR PRODUCTION NO. 19:**

8 Any and all DOCUMENTS evidencing any DEFENDANT's ownership, in whole or in
9 part, of real property for all years from 2023 to the present.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

11 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
12 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

13 **REQUEST FOR PRODUCTION NO. 20:**

14 Any and all DOCUMENTS evidencing any DEFENDANT's leasehold interest in, in whole
15 or in part, real property for all years from 2023 to the present.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

17 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
18 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

19 **REQUEST FOR PRODUCTION NO. 21:**

20 Any and all DOCUMENTS that refer, relate, or pertain to communications between YOU
21 and the Department of Justice between 2020-2024.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

23 Defendants will not produce and object on the basis that this is irrelevant and not reasonably
24 calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

25 **REQUEST FOR PRODUCTION NO. 22:**

26 Any and all DOCUMENTS that refer, relate, or pertain to the civil penalty assessed by
27 this Court on May 2, 2021.

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

Defendants will not produce and object on the basis that this is irrelevant and not reasonably calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

REQUEST FOR PRODUCTION NO. 23:

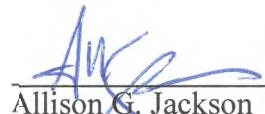
Any and all DOCUMENTS that refer, relate, or pertain to any agreement between YOU and the Department of Justice with respect to the payment of the civil penalty assessed by this Court on May 2, 2021.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Defendants will not produce and object on the basis that this is irrelevant and not reasonably calculated to lead to evidence regarding Plaintiff's claims nor Defendants' Defenses.

Dated: November 20, 2024

HARLAND LAW FIRM, LLP



Allison G. Jackson
Attorneys for Defendants
KERNEN CONSTRUCTION COMPANY,
BEDROCK INVESTMENTS LLC, SCOTT
FARLEY, and KURT KERNEN